## ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law 100 Lafayette Street, Suite 501 New York, NY 10013

Franklin A. Rothman Jeremy Schneider Robert A. Soloway David Stern

## MEMO ENDORSED

Tel: (212) 571-5500 Fax: (212) 571-5507

Rachel Perillo

June 24, 2025

## By ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Cesari, et al,

Including MIGUEL CINTRON

24 Cr. 154 (ER)

The application is X granted denied

Edgardo Ramos, U.S.D.J

Dated: June 24, 2025

New York, New York

Dear Judge Ramos:

I am the attorney for Miguel Cintron, a defendant in the above-named matter. Mr. Cintron is on pretrial release with conditions that include travel restricted to the Southern and Eastern Districts of New York, as well as New Jersey and Connecticut for employment purposes. This letter is respectfully submitted without objection from Pretrial Services Officer Lanique Rhyne to request a temporary bond modification that would permit Mr. Cintron to travel to Allentown, Pennsylvania tomorrow, June 25, 2025 and returning on June 27. Mr. Cintron's father is having surgery and Mr. Cintron wishes to travel to Allentown in order to assist him with his recovery. If this application is granted, Mr. Cintron will be staying at his mother's home, at an address that has been provided to Pretrial Services. The government, by AUSA Joseph Rosenberg, defers to Pretrial Services.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted, /s/
Jeremy Schneider

cc: AUSA Joseph R. Rosenberg & AUSA Adam Margulies (by ECF) USPTO Lanique Rhyne (by Email)